

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE MATTER OF THE *EX PARTE*  
APPLICATION OF B&C KB HOLDING  
GMBH FOR AN ORDER TO TAKE  
DISCOVERY PURSUANT TO 28 U.S.C.  
§ 1782 FROM GOLDBERG LINDSAY &  
CO. LLC D/B/A LINDSAY GOLDBERG  
AND MICHAEL DEES

Case No. 22-mc-180

**NOTICE OF THE *EX PARTE* APPLICATION OF B&C KB HOLDING GMBH  
FOR AN ORDER TO TAKE DISCOVERY  
PURSUANT TO 28 U.S.C. § 1782**

**PLEASE TAKE NOTICE** that B&C KB Holding GmbH, upon the accompanying Application, Memorandum of Law, Declaration of Dr. Michael Rohregger, Declaration of Thomas Zimpfer, Declaration of Dr. Jakob Danckert, Declaration of Zachary D. Rosenbaum, all exhibits attached thereto, and all other evidence the Court deems appropriate, petitions this Court, pursuant to 28 U.S.C. § 1782, for an order granting this Application to serve subpoenas on respondents Goldberg Lindsay & Co. LLC and Michael Dees.

Dated: July 14, 2022  
New York, New York

Respectfully submitted,

s/ Zachary D. Rosenbaum  
Zachary D. Rosenbaum  
Josef M. Klazen  
Leif T. Simonson  
[zachary.rosenbaum@kobrekim.com](mailto:zachary.rosenbaum@kobrekim.com)  
[jef.klazen@kobrekim.com](mailto:jef.klazen@kobrekim.com)  
[leif.simonson@kobrekim.com](mailto:leif.simonson@kobrekim.com)  
KOBRE & KIM LLP  
800 Third Avenue  
New York, New York 10022  
T: +1 212 488 1200  
F: +1 212 488 1220

*Attorneys for Applicant*  
*B&C KB Holding GmbH*